

# ROBERT GUILD

Attorney at Law

314 Pall Mall • Columbia, South Carolina 29201 • 803-252-1419 • bguild@mindspring.com

BY ELECTRONIC FILING AND SERVICE

September 1, 2020

Ms. Jocelyn D. Boyd  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

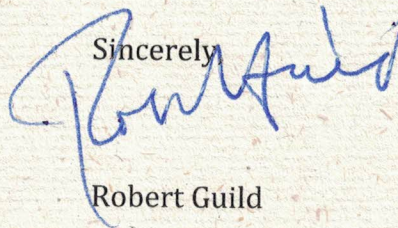
In re: Application of Dominion Energy South Carolina, Incorporated for Adjustment of  
Rates and Charges (See Commission Order No. 2020-313)  
Docket No. 2020-125-E

Dear Ms. Boyd:

Enclosed please find for filing and consideration in the above docket the Motion for  
Admission Pro Hac Vice for Dorothy E. Jaffe, Esquire, on behalf of Sierra Club, together  
with Docket Cover Sheet and Certificate of Service.

With kind regards I am

Sincerely



Robert Guild

Encls.

CC: All Parties





(Caption of Case)

In Re: Application of Dominion Energy South Carolina, Incorporated for Adjustment of Rates and Charges (See Commission Order No. 2020-313)

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

COVER SHEET

DOCKET  
NUMBER: 2020 - 125 - E

(Please type or print)  
Submitted by: Robert Guild  
Address: 314 Pall Mall Street  
Columbia, SC 29201

SC Bar Number: 2358  
Telephone: (803) 917 573  
Fax:  
Other:  
Email: bguild@mindspring.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

- ☐ Emergency Relief demanded in petition
- ☒ Request for item to be placed on Commission's Agenda expeditiously
- ☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input checked="" type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2020-125-E**

In re:

Application of Dominion Energy South  
Carolina, Incorporated for Adjustment  
of Rates and Charges (See Commission  
Order No. 2020-313)

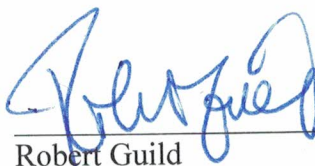
**MOTION FOR ADMISSION**  
***PRO HAC VICE***

Sierra Club hereby moves the Public Service Commission of South Carolina  
("Commission") to permit Dorothy E. Jaffe to practice *pro hac vice* before the Commission in  
the above-captioned matter.

Pursuant to SCACR 404, Ms. Jaffe, together with counsel of record, has filed a Verified  
Application for Admission *Pro Hac Vice* with the South Carolina Supreme Court. Attached  
hereto, is a copy of the Verified Application as filed with the court.

WHEREFORE, as the provisions set forth in SCACR 404 have been satisfied, Sierra  
Club requests this motion be granted.

Dated: September 1, 2020.



Robert Guild  
S.C. Bar No. 2358  
314 Pall Mall Street  
Columbia, SC 29201  
(803) 917-5738  
bguild@mindspring.com

*Attorney for Sierra Club*

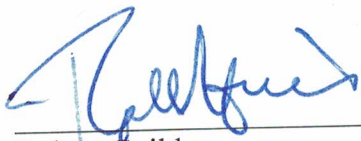
**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2020-125-E**

In re: Application of Dominion Energy  
South Carolina, Incorporated for  
Adjustment of Rates and Charges (See  
Commission Order No. 2020-313)  
Application of Duke Energy Carolinas,

**CERTIFICATE OF SERVICE**

I hereby certify that I have served the persons listed on the official service list for Docket No. 2020-125-E, listed below, a copy of the foregoing document via electronic mail on this day, September 1, 2020.

chad.burgess@dominionenergy.com; clybarker@scconsumer.gov; rhall@scconsumer.gov;  
abateman@ors.sc.gov; shamm@ors.sc.gov; chuber@ors.sc.gov; aknowles@ors.sc.gov;  
mwilloughby@willoughbyhoefer.com; belton.zeigler@wbd-us.com; kathryn.mansfield@wbd-us.com;  
manzelmo@mcguirewoods.com; matthew.gissendanner@dominionenergy.com; alex@shissiaslawfirm.com;  
bguild@mingspring.com

  
\_\_\_\_\_  
Robert Guild



**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*  
IN THE STATE OF SOUTH CAROLINA**

IN RE:

Docket No. 2020-125-E

Application of Dominion Energy South Carolina,  
Incorporated for Adjustment of Rates and  
Charges (See Commission Order No. 2020-313)

Public Service Commission of  
South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

Comes now Dorothy E. Jaffe, applicant herein, and respectfully represents the following:

1. Applicant resides at:

7796 Kawshek Path

Street Address

Hanover

Anne Arundel

MD

21076

City

County

State

Zip Code

802-236-0368

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)

Sierra Club, with offices at

50 F Street NW, Floor 8

Street Address

Washington

Washington

DC

20001

City

County

State

Zip Code

202-675-6275

802-236-0368

202-547-6009

dori.jaffe@sierraclub.org

Primary Telephone

Cell Phone

Fax Number

Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by

Sierra Club to provide legal representation in  
connection with the above case now pending before the above-named tribunal of the State of South Carolina.

4. Since December of 2015, applicant has been, and presently is, a  
member in good standing of the bar of the highest court of the District of Columbia or the State of  
Maryland where applicant regularly practices law. Attached is a certificate of good  
standing dated within the last 90 days from the bar of the highest court of the District of Columbia or the State  
where applicant regularly practices law.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts  
applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of  
Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:	Date Admitted:
State of Arizona	November 1, 2002
State of Washington	November 13, 2003
U.S. Court of Appeals, Ninth Circuit	January 5, 2015

Court:	Date Admitted:
U.S. District Court of Washington, Eastern District	December 9, 2008
U.S. District Court of Washington, Western District	September 16, 2008

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

State of Arizona (voluntarily resigned)
State of Washington (inactive)

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court date):

N/A
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7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

N/A
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8. Applicant never has had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked, except as provided below (give particulars, e.g., date, court, administrative body, date of suspension and reinstatement):

N/A
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9. Local counsel of record associated with applicant in this case is Robert Guild of the \_\_\_\_\_ law firm, which has offices at:

314 Pall Mall Street  
 Street Address  
Columbia Richland SC 29201  
 City County State Zip Code  
803-252-1419 803-917-5738 bguild@mindspring.com  
 Primary Telephone Cell Phone Fax Number Email Address  
803-917-5738  
 South Carolina Bar Number


10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

In Re: South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource Plans for Dominion Energy South Carolina, Incorporated; Docket No. 2019-226-E, Case: open; 4-8-2020; Local Counsel: Robert Guild; Application Granted.
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11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above-named tribunal for this case only.

DATED this 28<sup>th</sup> day of August, 2020



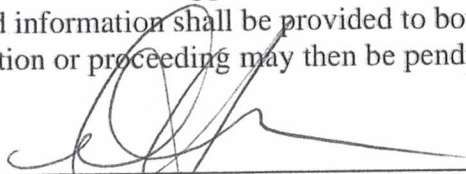
DOROTHY E. JAFFE, APPLICANT



**VERIFICATION**

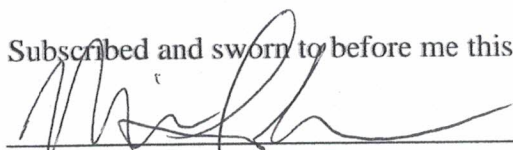
STATE OF Maryland  
COUNTY OF Anne Arundel

I, Dorothy E. Jaffe, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true. I understand that I am under a continuing duty to promptly update the information provided in the application until the tribunal has ruled on the motion for admission pro hac vice. Further, if the motion is granted, I understand that I am under a continuing duty to promptly update the information provided in the application as long as I continue to appear pro hac vice in the action or proceeding. Any updated information shall be provided to both the tribunal that granted the motion and to the tribunal in which the action or proceeding may then be pending.



DOROTHY E. JAFFE, APPLICANT/AFFIANT

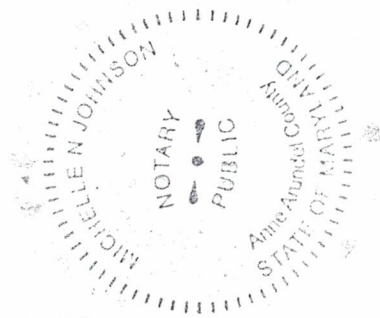
Subscribed and sworn to before me this 28<sup>th</sup> day of August, 2020



Michelle Johnson

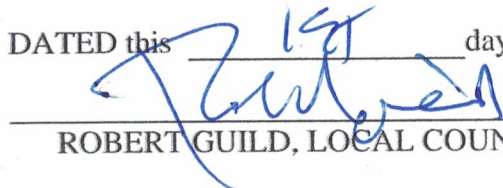
Notary Public for the State of Maryland

My Commission Expires: March 13, 2024

**LOCAL COUNSEL CONSENT**

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 1<sup>st</sup> day of SEPTEMBER 2020



ROBERT GUILD, LOCAL COUNSEL OF RECORD

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this

1<sup>st</sup> day of SEPTEMBER, 2020



ROBERT GUILD, LOCAL COUNSEL OF RECORD



**Court of Appeals  
of Maryland**  
Annapolis, MD



***CERTIFICATE OF GOOD STANDING***

*STATE OF MARYLAND, ss:*

*I, Suzanne Johnson, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the fourteenth day of December, 2015,*

**Dorothy Elizabeth Jaffe**

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

**In Testimony Whereof,** *I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
twenty-fourth day of August, 2020.*

A handwritten signature in cursive script, appearing to read "Suzanne Johnson", written in dark ink.

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*Clerk of the Court of Appeals of Maryland*